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June 27, 2019

VIA ECF

Hon. Jesse M. Furman
United States District Judge
U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: Accent Delight Int'l Ltd. et al. v. Sotheby's et al., No. 18 Civ. 9011

Dear Judge Furman:

We oppose Defendants' June 27 letter-motion for a 45-day extension of time to answer the Complaint, as well as a postponement of the initial pretrial conference set by the Court for July 24.

We oppose these requested extensions because:

1. The requests are unreasonable. Defendants have had the Amended Complaint for well over half a year, and could have drafted an Answer already in the event their motion to dismiss was denied. Fed. Civ. P. 12(a)(4)(A) warned Defendants that they would have 14 days to serve their Answer if the Court denied their motion. No reason exists for any extension, much less one of 45 days.

2. While we believe in professional courtesy and civility, Defendants have abused those values in the past. The Court knows how we in good faith consented to an extension requested by Sotheby's in October 2017 only for Sotheby's to use that extension to file a proceeding in Switzerland designed to deprive to preclude our clients from suing in England.

EMERY CELLI BRINCKERHOFF & ABADY LLP

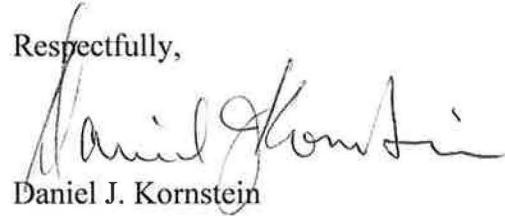
Hon. Jesse M. Furman

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The extension should be denied.

Respectfully,

A handwritten signature in black ink, appearing to read "Daniel J. Kornstein". The signature is fluid and cursive, with the first name "Daniel" and last name "Kornstein" clearly distinguishable. It is positioned above the printed name "Daniel J. Kornstein".

Daniel J. Kornstein

DJK:cr

cc: All counsel of record (via ECF)